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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSE LUIS RAMOS,

Defendant.

CASE NO. 2:21-CR-00225-02 WBS

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
ORDER

DATE: October 17, 2022
TIME: 9:00 a.m.
COURT: Hon. William B. Shubb

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on October 17, 2022.
2. By this stipulation, defendant now moves to exclude time between today, September 20, 2022, and October 17, 2022, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case is voluminous, and includes wiretap intercepts, reports, and photographs.
 - b) Counsel for defendant needs additional time to meet with her client, conduct factual investigation, review the discovery, research sentencing and resolution options, and otherwise prepare for trial.

1 c) Counsel for defendant believes that failure to grant the above-requested
2 continuance would deny her the reasonable time necessary for effective preparation, taking into
3 account the exercise of due diligence.

4 d) The government does not object to the continuance.

5 e) Based on the above-stated findings, the ends of justice served by continuing the
6 case as requested outweigh the interest of the public and the defendant in a trial within the
7 original date prescribed by the Speedy Trial Act.

8 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
9 et seq., within which trial must commence, the time period of September 20, 2022 to October 17,
10 2022, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
11 T4] because it results from a continuance granted by the Court at defendant's request on the basis
12 of the Court's finding that the ends of justice served by taking such action outweigh the best
13 interest of the public and the defendant in a speedy trial.

14 **[CONTINUED ON NEXT PAGE]**

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: September 20, 2022

PHILLIP A. TALBERT
United States Attorney

/s/ CAMERON L. DESMOND
CAMERON L. DESMOND
Assistant United States Attorney


Dated: September 20, 2022

/s/ Megan Hopkins
Megan Hopkins
Counsel for Defendant
Jose Luis Ramos

FINDINGS AND ORDER

IT IS SO FOUND AND ORDERED.

Dated: September 20, 2022


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE